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*The nation's most influential advocacy organization  
protecting children against sex, violence and profanity in entertainment*

February 12, 2019

The Honorable Ajit Pai, Chairman  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Dear Chairman Pai:

In recent years I have had the opportunity to discuss with you in person the Parents Television Council's concern about the deeply-flawed television content rating system and its ostensible oversight. I have also spoken in person with Commissioners O'Rielly and Rosenworcel about this vexing issue. Today I urgently renew my call for the FCC's swift and thorough review of its 1998 Report and Order establishing the V-Chip, the television content ratings system, and the Parental Guidelines Oversight Monitoring Board.

As I write these words to you, we are approximately 48 hours away from the one-year anniversary of the slaughter of seventeen innocent lives at Marjory Stoneman Douglas High School in Parkland, Florida. Since that tragic event, the nation has fiercely debated its root causes and potential remedies. One such root cause, as identified by scientific and academic scholars, is an entertainment media culture that is saturated in bloody gun violence.

Shortly after the Parkland shooting, President Trump made public reference to media violence and the need for effective measures to help parents protect their children from it. The Parents Television Council swiftly produced a research report documenting the amount of gun violence on primetime broadcast television, and noted that all of it was rated as appropriate for children as young as fourteen, and in some cases, even younger. Additionally, almost 61% of the episodes contained violence; and 39% contained violence and guns. (A copy of that report can be found [here](#).)

By way of comparison, research conducted by the PTC in 2013 during the month following Newtown found that on primetime broadcast TV shows, nearly half contained violence; and almost a third contained violence and guns – meaning that five years post-Newtown, TV violence has increased.

Within a month following Parkland, the White House convened a meeting with Video Game industry leaders and grassroots media advocates to discuss the impact of violent

entertainment on children; and the PTC was honored to be invited and in attendance at that meeting, literally sitting next to the President in the Cabinet Room.

One outcome of that meeting was that the President directed Education Secretary DeVos to create a Safe Schools Commission. In December that Commission released a final report, citing misleading and inaccurate ratings as one issue to explore for the prevention of future violence:

“Violent entertainment and rating systems: The role of the family is central to controlling violent entertainment. State and local educational agencies should collaborate with parents to strengthen internet safety measures to curb access to inappropriate content. In addition, the entertainment industry should ensure its rating systems provide parents with the full complement of information needed to make informed decisions about entertainment for their children.”

<https://www2.ed.gov/documents/school-safety/school-safety-report.pdf>

Chairman Pai, since the FCC’s adoption of its Report and Order over 20 years ago, neither the Commission nor the Congress has ever once convened a hearing or a formal review of a content ratings system that families across our nation are told to rely upon in order to protect their children from proven harm. We urgently call on the FCC today to act on the DOE commission’s recommendation.

If the entertainment industry is going to honor its commitment to families, the TV ratings system must be accurate and consistent; and the ratings process ought to be transparent and accountable to the public, especially to the parents for whom the system was created. Today it delivers on none of these things.

What the entertainment industry does is offer dress rehearsals for gun violence on TV, in the movies, in violent video games, and then proceeds to rate shows with graphic violence and gun violence as appropriate for children. This is clear evidence that the entertainment industry contributes to marketing a culture of violence to children.

Gun violence has been Hollywood’s favorite kind of violence for years. A 2013 [study](#) from the Annenberg Public Policy Center found that gun violence tripled in PG-13-rated films. And violence is typically rated lower than films with sexual content, meaning that more children will be able to watch those kinds of films.

Parents are told to use the ratings. But those ratings are often misleading, or outright deceptive. The process by which the ratings are applied is secretive, those who administer them are accountable to nobody; and parents have no real recourse when they are misapplied.

The ESRB ratings are supposed to help keep violent video games out of the hands of children, yet [PTC research](#) has revealed how easy it is for an unaccompanied minor to purchase an

adult-rated video game; and the video game industry fought for the right of retailers – all the way to the Supreme Court – to sell violent video games to unaccompanied minors.

The academic community has warned us for over 60 years of the real-life impact of violent media content, yet the volume and degree of [TV violence has increased](#), substantially.

We have called on the governing body for TV content ratings – the TV Parental Guidelines Oversight Monitoring Board – to improve the TV ratings system, but our calls have fallen on the very same deaf ears that control the system and game it to their advantage. When TV content ratings are determined by each respective network, and the system's oversight is administered entirely by the same people who assign inaccurate content ratings to begin with, it is impossible for the system to protect children as it was intended. The TV content ratings system needs to be overhauled so it truly serves the needs of parents and families, and not to provide cover for the industry.

Please consider and accept this urgent call for your leadership on this important issue. The PTC stands ready, willing, and in fact *eager* to serve the FCC in this much-needed regulatory review, as we have documented inaccurately-rated television programming for over two decades. Please do not hesitate to call on me for any assistance.

Sincerely,



Timothy F. Winter  
President

cc: Commissioner Michael O’Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Commissioner Geoffrey Starks